

EXHIBIT 19
FILED UNDER SEAL

STATE OF UTAH
OFFICE OF THE ATTORNEY GENERAL



SEAN D. REYES
ATTORNEY GENERAL

Spencer E. Austin
Chief Criminal Deputy

Daniel Burton
General Counsel

Ric Cantrell
Chief of Staff

Melissa A. Holyoak
Solicitor General

Brian L. Tarbet
Chief Civil Deputy

June 10, 2024

Via E-Mail Only

Xiaoxi Tu
Freshfields, Bruckhaus, Deringer US LLP
3 World Trade Center
175 Greenwich Street
New York, NY 10007
Xiaoxi.tu@freshfields.com


Re: *State of Texas et al. v. Google LLC, No. 1:21-cv-06841 (PKC)*
Plaintiff State of Utah's Litigation Holds

Dear Ms. Tu,

We are writing in response to Google's correspondence of May 14, 2024, concerning whether the Utah Department of Commerce, Division of Consumer Protection ("DCP"), issued a litigation hold letter. Firstly, please note that I was not representing DCP as its Rule 30(b)(6) designee concerning DCP's document retention policies and procedures during this deposition. Per the states' correspondence of March 29, 2024, DCP's designee Melanie Hall was the proper person to whom a question concerning DCP's litigation hold should have been asked. Regardless of Google's failure to ask this question of the proper Rule 30(b)(6) designee, and in a show of good faith and avoid a discovery dispute, DCP is willing to sign a declaration stating that it did not issue a litigation hold letter in this matter. Please note that as to both the AGO and DCP, it would have been redundant to issue a litigation hold letter given the 15-year records retention schedules that employees of both agencies are required to follow.

By making this proposal, neither the Utah Attorney General's Office, Division of Antitrust & Data Privacy ("AGO") nor DCP agrees to further discovery or depositions in this matter.

Sincerely,


Marie W.L. Martin,
Deputy Division Director